

1 Scott E. Gizer, Esq., Nevada Bar No. 12216  
2 *sgizer@earlysullivan.com*  
3 Sophia S. Lau, Esq., Nevada Bar No. 13365  
4 *slau@earlysullivan.com*  
5 EARLY SULLIVAN WRIGHT  
6 GIZER & McRAE LLP  
7 8716 Spanish Ridge Avenue, Suite 105  
8 Las Vegas, Nevada 89148  
9 Telephone: (702) 331-7593  
10 Facsimile: (702) 331-1652

11 Kevin S. Sinclair, Nevada Bar Number 12277  
12 *ksinclair@sinclairbraun.com*  
13 SINCLAIR BRAUN LLP  
14 16501 Ventura Boulevard, Suite 400  
15 Encino, California 91436  
16 Telephone: (213) 429-6100  
17 Facsimile: (213) 429-6101

18 Attorneys for Defendant  
19 CHICAGO TITLE INSURANCE COMPANY

20 DESIGNATED LOCAL COUNSEL FOR SERVICE OF  
21 PROCESS ON SINCLAIR BRAUN LLP PER L.R. IA 11-1(b)

22 Gary L. Compton, State Bar No. 1652  
23 2950 E. Flamingo Road, Suite L  
24 Las Vegas, Nevada 89121

25  
26  
27  
28  
**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

29 HSBC BANK, USA, NATIONAL  
30 ASSOCIATION, AS TRUSTEE FOR  
31 MORTGAGE PASS-THROUGH  
32 CERTIFICATES, MLMI SERIES 2006-A4,

33 Plaintiff,

34 vs.

35 FIDELITY NATIONAL TITLE GROUP,  
36 INC., et al.,

37 Defendants.

Case No.: 2:21-cv-00195-RFB-DJA

**STIPULATION AND PROPOSED  
ORDER EXTENDING DEFENDANT  
CHICAGO TITLE INSURANCE  
COMPANY'S TIME TO RESPOND  
TO MOTION FOR REMAND [ECF  
No. 9] AND MOTION FOR FEES AND  
COSTS [ECF No. 10]**

**(Second Request)**

Defendant Chicago Title Insurance Company (“Chicago Title”) and Plaintiff HSBC Bank USA, National Association, as Trustee for Mortgage Pass-Through Certificates, MLMI Series 2006-A4 (“HSBC Bank”) (collectively, the “Parties”), by and through their counsel of record, hereby stipulate and agree as follows:

1. On February 3, 2021, HSBC Bank filed its Complaint in the Eighth Judicial District Court, Case No. A-21-828889-C [ECF No. 1-1];
2. On February 3, 2021, Chicago Title filed a Petition for Removal to this Court [ECF No. 1];
3. On March 5, 2021, HSBC Bank filed a Motion for Remand [ECF No. 9];
4. On March 5, 2021, HSBC Bank filed a Motion for Costs and Fees [ECF No. 10];
5. Chicago Title’s original deadline to respond to HSBC Bank’s Motion for Remand and Motion for Costs and Fees was March 19, 2021;
6. On March 17, 2021, Chicago Title filed a Stipulation and Order requesting until April 2, 2021 to respond to HSBC Bank’s Motion for Remand and Motion for Costs and Fees.
7. On March 25, 2021, the Court granted Chicago Title’s request and Chicago Title’s response to HSBC Bank’s Motion for Remand and Motion for Costs and Fees is currently due on April 2, 2021.
8. Chicago Title’s counsel is requesting an extension until April 9, 2021, to file its response to the pending Motion for Remand and Motion for Costs and Fees;
9. Chicago Title requests a brief extension of time to respond to the Motion for Remand and Motion for Costs and Fees to afford Chicago Title additional time to respond to the legal arguments set forth in HSBC Bank’s motions;
10. HSBC Bank does not oppose the requested extension;
11. This is the second request for an extension which is made in good faith and not for purposes of delay;

///

///

1           **IT IS SO STIPULATED** that Chicago Title's deadline to respond to HSBC Bank's  
2 Motion for Remand [ECF No. 9] and Motion for Costs and Fees [ECF No. 10] is hereby extended  
3 through and including April 9, 2021.

4  
5 Dated: April 2, 2021

EARLY SULLIVAN WRIGHT  
GIZER & McRAE LLP

6  
7 By: /s/-- Sophia S. Lau  
8 SCOTT E. GIZER  
9 SOPHIA S. LAU  
Attorneys for Defendant CHICAGO TITLE  
INSURANCE COMPANY

10 Dated: April 2, 2021

SINCLAIR BRAUN LLP

11 By: /s/-Kevin S. Sinclair  
12 KEVIN S. SINCLAIR  
13 Attorneys for Defendant CHICAGO TITLE  
INSURANCE COMPANY

14 Dated: April 2, 2021

WRIGHT FINLAY & ZAK, LLP

15 By: /s/-Lindsay D. Robbins  
16 LINDSAY D. ROBBINS  
17 Attorneys for Plaintiff HSBC BANK, U.S.A,  
N.A.

18 **IT IS SO ORDERED:**

19  
20 Dated: April 5, 2021.

21   
22 **RICHARD E. BOULWARE, II**  
23 **United States District Court**

**CERTIFICATE OF SERVICE**

I hereby certify that on April 2, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the Electronic Service List for this Case.

I declare under penalty of perjury under the laws of the United State of America that the foregoing is true and correct.

/s/ D'Metria Bolden

D'METRIA BOLDEN

An Employee of EARLY SULLIVAN

WRIGHT GIZER & McRAE LLP

